

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:
JESUS JAVIER RIVERA CARIDE
DEBTOR

CASE NO. 24-02892 ESL
CHAPTER 13

**MOTION TO WITHDRAW AS COUNSEL DUE TO CONFLICT OF INTEREST AND
REQUEST FOR EXTENSION OF TIME**

TO THE HONORABLE COURT:

COMES NOW, Lcdo. Carlos Alberto Ruiz, LLC, counsel of record for the Debtor, Jesus Javier Rivera Caride, in the above-captioned bankruptcy case, and respectfully states as follows:

1. Representation:

The undersigned counsel, Lcdo. Carlos Alberto Ruiz, LLC, currently represents the Debtor in this bankruptcy proceedings. The debtor filed his Chapter 13 bankruptcy voluntary petition on July 11th, 2024. [See ECF no. 1]

2. Conflict of Interest:

Counsel has recently become aware of a conflict of interest that has arisen which prevents continued representation of the Debtor in accordance with the ethical standards required by the profession. This conflict of interest was not known at the time of initial representation, and, after due consideration, it has been determined that continued representation would compromise both the interests of the Debtor and the ethical obligations of counsel.

3. Request to Withdraw:

In light of the conflict of interest, the undersigned counsel respectfully requests

permission from this Honorable Court to withdraw as counsel for the Debtor in this matter.

4. Extension of Time:

To ensure that the Debtor is not prejudiced by the withdrawal of counsel, the undersigned counsel respectfully requests that the Court grant the Debtor an extension of time of thirty-one (31) days from the date of the Order granting this Motion to allow the Debtor sufficient time to obtain new legal representation.

5. Service:

The undersigned counsel will ensure that a copy of the Order granting this Motion is promptly served upon the Debtor, and any other relevant parties, and will assist in the transition to new counsel as needed.

WHEREFORE, the undersigned counsel respectfully requests that this Honorable Court enter an order:

1. Granting the undersigned counsel's request to withdraw as counsel of record for the Debtor;
2. Granting the Debtor an extension of thirty-one (31) days to obtain new legal representation;
3. And for any other relief that the Court deems just and proper.

RESPECTFULLY SUBMITTED

In Caguas, Puerto Rico, this 30th day of August 2024.

CERTIFICATE OF SERVICE: I CERTIFY that on this same date the foregoing document has been electronically filed WITH THE Clerk of the Court using the CM/ECF system which sends notification of such filing to all system's participants, including the U.S. Trustee's Office and the Trustee. I also certify that on the same date I have mailed a true and exact copy of this motion to the debtor to the following email address: jeshuajrc21@yahoo.com

NOTICE: Within **fourteen (14) days** after service as evidenced by the certification, and an additional **three (3) days** pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve, and file an objection or other appropriate response to this paper with the clerk's office of the United States Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the court, the interest of justice requires otherwise.

/s/ CARLOS A. RUIZ RODRIGUEZ

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Attorney for Debtor

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